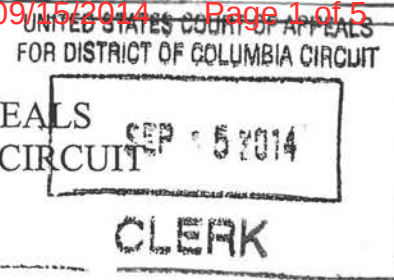


UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT



SINCLAIR BROADCAST GROUP,
INC.

Petitioner,

v.

FEDERAL COMMUNICATIONS
COMMISSION and UNITED
STATES OF AMERICA,

Respondents.

Case No.

14-1179

**PETITION FOR REVIEW OF FINAL ORDER
ON INCENTIVE AUCTIONS**

Pursuant to Section 402(a) of the Communications Act of 1934, 47 U.S.C. § 402(a), 28 U.S.C. § 2342-2344, and Federal Rule of Appellate Procedure 15, Sinclair Broadcast Group, Inc. ("Sinclair") hereby petitions this Court for review of the final order of the Federal Communications Commission ("Commission") captioned *Expanding the Economic and Innovative Opportunities of Spectrum Through Incentive Auctions*, Report and Order, GN Dkt. No. 12-268 (rel. June 2, 2014) ("Order"). This Order was published in the Federal Register on August 15, 2014. See 79 Fed. Reg. 48,442 (Aug. 15, 2014). A copy of the Order is attached as Exhibit A to this petition for review.

Venue lies in this Court pursuant to 28 U.S.C. § 2343.

Sinclair is a television broadcaster that holds licenses issued by the Commission. Sinclair participated in the proceedings below and is aggrieved and otherwise injured by the Order.

Sinclair seeks review of the Order on the grounds that it: (1) was adopted in excess of the Commission's authority; (2) violates the Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156 (2012); (3) violates 47 U.S.C. § 309(j) and 47 U.S.C. § 1452; (4) is arbitrary, capricious, and an abuse of discretion under the Administrative Procedure Act ("APA"), 5 U.S.C. § 706(2); (5) violates Section 5(c) of the Communications Act of 1934, as amended, 47 U.S.C. § 155(c); and (6) is otherwise contrary to law.

Accordingly, Sinclair respectfully requests that this Court hold unlawful, vacate, enjoin, and set aside the Order and grant such additional relief as may be necessary and appropriate.

Dated: September 15, 2014

Respectfully submitted,

Handwritten signature of Clifford M. Harrington, consisting of the letters 'TH' followed by a stylized 'all' and a horizontal line.

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Counsel for Sinclair Broadcast Group,
Inc.

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and District of Columbia Circuit Rules 21 and 26.1, Sinclair Broadcast Group, Inc. ("Sinclair") hereby submits the following disclosure statement: Sinclair is a Maryland corporation that is publicly traded on the NASDAQ Stock Exchange [NASDAQ:SBGI].

Sinclair operates and provides programming and sales services to television stations in various cities across the country. Sinclair has no parent company and no publically traded company owns more than 10% of Sinclair's stock.

Dated: September 15, 2014

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of September 2014, I caused a true and accurate copy of the foregoing to be served by on the following by the method indicated:

Jonathan Sallet, Esq.
General Counsel
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Via Hand Delivery

The Honorable Eric Holder
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Washington D.C. 20530-0001

Via First Class Mail, Postage Prepaid



Thomas G. Allen